

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

GERALD RUHNOW; CONNIE
RUHNOW,

Plaintiffs,

V.

LANE HEARD TRUCKING, et. al.,

Defendants.

NORTHLAND INSURANCE CO.

Intervener,

V.

LANE HEARD TRUCKING, et. al.

Defendants.

MOTION BY NORTHLAND INSURANCE COMPANY
FOR ADDITIONAL JURY QUESTIONS

COMES NOW Northland Insurance Company (“Northland”) and hereby requests that this Court add the following questions to the jury questionnaire in the above referenced matter:

1. Have any of you ever been involved in a motor vehicle accident?

If so, please give the specifics of that accident.

2. Have any of you ever had a family member injured or killed in a motor vehicle accident?

3. Have any of you ever witnessed a motor vehicle accident?

If so, please give the specifics of that accident.

4. Do any of you have any experience driving an 18-wheeled tractor/trailer?

If so, how long have you been driving such a vehicle?

5. Have any of you ever filed a claim with an insurance company?

If so, what was the nature of the claim?

To what insurance company did you submit the claim?

What was the outcome of the claim?

Were you satisfied with how your insurance claim was handled?

6. Are any of you involved in a business that is now or, to your knowledge, has been in the past insured with Northland Insurance Company?

7. Do any of you feel that you would have any bias against Northland Insurance Company based on the fact that it is a corporation that is a plaintiff in this action?

8. Do any of you have experience driving a motorcycle?

If so, how long have you been driving a motorcycle?

Have you ever been involved in an accident while driving a motorcycle?

If so, describe the nature of that accident.

9. Do any of you know any of the parties in this lawsuit?

If so, which one(s)?

How long and how well have you known them?

10. Do any of you know any of the attorneys involved in this action?

If so, which one(s)?

How long and how well have you known them?

11. Have any of you ever traveled on Highway 231 in Pike County, south of the City of Troy?

If so, how familiar are you with that stretch of road?

12. Are any of you or your immediate family members involved in law enforcement?

If so, in what capacity and for how long?

13. Northland also requests that the Court ask the jury if they know any of the potential witnesses in this case.

Respectfully submitted this 16th day of January, 2007.

/s/ Linda Hinson Ambrose, Esq.

ASB 1753-B386

Attorney for Northland Insurance Company

OF COUNSEL:

ROGERS AND ASSOCIATES

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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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Respectfully submitted,
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